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February 5, 2020

VIA ECF  
Hon. Sean M. Lane  
United States District Court  
Southern District of New York  
300 Quaroppas St.  
White Plains, New York 10601

RE: In re Michele Foley  
Case No. 19-23257(shl)

Dear Judge Lane:

The undersigned represents debtor Michele Foley in the above matter. This shall constitute a status letter as required by the Court.

Our office has made numerous attempts to contact the debtor with respect a possible conversion of this matter to one under Chapter 11, and adequate protection payments.

Our office has made numerous telephone calls, and sent letters via email and FedEx, to ascertain the debtors intention, to which we have received no response. We have also learned that no adequate protection payments have been received since October.

In short, we have been unable to communicate with the debtor, short of a personal visit to the debtors residence.

Our office shall, on a daily basis, continue our efforts to communicate with the debtor. In the event of a continued failure to communicate, my office will move to be relieved as counsel.

Most respectfully,

Robert S. Lewis  
ROBERT S. LEWIS

RSL/lsr  
c. All Counsel-VIA ECF